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5	UNITED STATES DISTRICT COURT	
6	NORTHERN DISTRICT OF CALIFORNIA	
7		
8	UNITED STATES OF AMERICA,	CASE NO. 22-CR-0193 VC [JCS]
9	Plaintiff,	STIPULATION AND [PROPOSED] ORDER TO MODIFY JAMES MORAN'S PRETRIAL
10	v.)	RELEASE CONDITIONS TO PERMIT TRAVEL
11	JAMES MORAN,	
12	Defendant.	
13	·	
14	Defendant James Moran and the United States stipulate and agree as follows:	
15	1. Mr. Moran is currently on pretrial release, post-conviction, subject to the condition that he	
16	may not travel outside the Northern District of California and the District of Nevada, where	
17	he currently resides. Mr. Moran, as of August 30, 2023, will also be subject to location	
18	monitoring, which would remain connected during the period of his proposed travel.	
19	2. The parties agree that Mr. Moran's release conditions should be temporarily modified to	
20	permit Mr. Moran to travel with his father to St. Louis, Missouri and Milwaukee, Wisconsin,	
21	to visit two of his aunts. He and his father would depart Reno by car on September 12, 2023,	
22	and arrive in Missouri on September 15, 2023. They would then travel to Milwaukee on	
23	September 26, 2023 and stay with another aunt until October 7, 2023. They intend to return	
24	to Reno, Nevada on October 10, 2023.	
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3. Pretrial Services Officer Pepper Friesen has no objection to the request. 1 4. AUSA Kaitlin Paulson has no objection to the request. 2 5. 3 Mr. Moran shall provide his pretrial officer with a detailed travel itinerary. 4 5 IT IS SO STIPULATED. DATED: August 30, 2023 6 KAITLIN RACKERBY PAULSON 7 Assistant United States Attorney 8 DATED: August 30, 2023 9 JULIA M. JAYNE Counsel for Defendant JAMES MORAN 10 11 [PROPOSED] ORDER 12 PURSUANT TO STIPULATION, IT IS SO ORDERED. Mr. Moran is permitted to travel to 13 outside the Northern District of California and the District of Nevada to St. Louis, Missouri and 14 Milwaukee, Wisconsin, by car, from September 12 – October 10, 2023. Mr. Moran shall provide his 15 pretrial officer with a detailed itinerary. All other pretrial release conditions remain the same. 16 17 IT IS SO ORDERED. 18 CA 19 DATED: August 31, 2023 N. JOSEPH S. SPERO 20 United States Magistrate Judge 21 22 23 24 25 26 27 28

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